

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WESTERN TEXAS
MIDLAND-ODESSA DIVISION**

JENNIFER VETRANO,

Plaintiff,

v.

JOHN BRDA,
ALLISON CHRISTILAW, MBA, ICD.D B,
JOHN R. HARDING, UZI SASSON,
DAN EATON ESQ, MAURICE GUITTON,
ERIC M. LESLIE, PHILIPPE MORALI,
KEN HANNAH, STEEN KARSBO,
JOHN DOES 1-20, JANE DOES 1-20

Defendants.

Case No.: 7:24-CV-00325-DC-RCG

FILED

MAR 31 2025

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY *[Signature]* DEPUTY

PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT BY THE CLERK

TO THE CLERK OF THE COURT:

Plaintiff, Jennifer Vetrano ("Plaintiff"), respectfully requests the Clerk to enter default against Defendant, Uzi Sasson ("Defendant"), pursuant to Rule 55(a) of the Federal Rules of Civil Procedure. In support, Plaintiff states as follows:

I. FACTUAL BACKGROUND

Plaintiff filed the Complaint against Defendant on December 27, 2024. Defendant was properly served with the Summons and Complaint on February 26, 2025, as evidenced by the Return of Service filed with this Court on the same date. Defendant was required to file an Answer or otherwise respond by March 19, 2025, in accordance with the Federal Rules of Civil Procedure.

Defendant failed to timely respond. Instead, Defendant filed an untimely and procedurally deficient Motion to Dismiss on March 20, 2025, without obtaining an extension from Plaintiff or the Court.

II. ARGUMENT

Rule 55(a) of the Federal Rules of Civil Procedure states that "when a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party's default."

Here, the Defendant was obligated to respond by March 19, 2025, and has failed to do so appropriately. Defendant's untimely and deficient Motion to Dismiss does not constitute a valid or timely response. Therefore, entry of default by the Clerk is appropriate.

III. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the Clerk of the Court:

Enter default against Defendant pursuant to Rule 55(a) of the Federal Rules of Civil Procedure and provide such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ Jennifer Vetrano

Jennifer Vetrano, Pro Se

25 Pond Hollow Lane

West Creek, NJ 08092

Phone: 908-783-0105

Email: Jvetrano999@gmail.com

Dated: 3/20/2025

Certificate of Service: I hereby certify that on March 28, 2025, a true and correct copy of the foregoing document was sent via email to John Russell Hardin, counsel for Defendant, at JohnHardin@perkinscoie.com, in compliance with the Federal Rules of Civil Procedure.

/S/Jennifer Vetrano

01019510605

This box is for use with the following services:

**UPS Next Day A
UPS Worldwide
UPS 2nd Day
UPS Worldwide**

UPS® Ground **UPS® Standard** **UPS 3 Day Select**

25 Apply shipping

Do not use this box for:

